

**STATEMENT OF BASIS (AI No. 43249)**

for draft modification of Louisiana Pollutant Discharge Elimination System Permit No. LA0123307 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Slidell Welding Service Inc.  
Post Office Box 1537  
Pearl River, Louisiana 70452-1537

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** March 12, 2008

**1. PERMIT STATUS****A. Reason For Permit Action:**

Modification of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit.

**B.** LPDES permit - LA0123307  
LPDES permit effective date: February 1, 2008  
LPDES permit expiration date: January 31, 2013

**C.** Date Modification Request Received: March 7, 2008

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY -**

Slidell Welding Service Inc. is an existing steel fabrication facility. The company primarily fabricates cranes. The facility receives crane parts which are assembled and cleaned then sends the fabricated cranes to various other facilities. This modification comes as a result of the facility requesting a reduction in the monitoring frequencies of their outfalls. After both Permit and Enforcement staff met with a representative of the facility, a decision was reached that the monitoring frequency for both sanitary outfalls at the facility would be reduced from 1/quarter to 1/6 months. This decision was based on the facility's DMR compliance record for the last three years and is consistent with monitoring of other sanitary outfalls at industrial facilities.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 3446,3499

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C. LOCATION - 38123 Highway Department Road, Pearl River, St. Tammany  
Parish Latitude 30°20'49", Longitude 89°45'51"

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant with chlorination  
Location: at the point of discharge from the sewage treatment plant  
located on the southeast side of the facility  
(Latitude 30°20'49", Longitude 89°45'51")  
Flow: 300 gpd  
Discharge Route: local drainage thence to W15 Canal thence to Doubloon  
Bayou thence to Fritchie Marsh

#### Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant with chlorination  
Location: at the point of discharge from the sewage treatment plant  
located on the northeast side of the facility  
(Latitude 30°20'49", Longitude 89°45'51")  
Flow: 100 gpd  
Discharge Route: local drainage thence to W15 Canal thence to Doubloon  
Bayou thence to Fritchie Marsh

### 4. RECEIVING WATERS

STREAM - local drainage thence to W15 Canal thence to Doubloon Bayou  
thence to Fritchie Marsh

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040907

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife

### 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

### 5. COMPLIANCE HISTORY/COMMENTS

#### A. Compliance History

There have been no recent inspections at the facility.

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#### B. DMR Review/Excursions

A DMR review of the past three years showed no excursions. All DMR's had been submitted with the then current permit, LAG530660.

### 6. EXISTING EFFLUENT LIMITS

Outfalls 001 and 002 - treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow - gpd	Report 1/quarter Est.	Report 1/quarter Est.
BOD	---	45 mg/L 1/quarter Grab
TSS	---	45 mg/L 1/quarter Grab
Fecal Coliform	---	400 col./100 mL 1/quarter Grab
pH	6.0 - 9.0 s.u. 1/quarter Grab	

### 7. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040907 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007, from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

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#### 8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### 9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to modify a permit for the discharge described in the application.

#### 10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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#### Rationale for Slidell Welding Service Inc.

1. Outfalls 001 and 002 - treated sanitary wastewater (estimated flow for Outfall 001 is 300 gpd and Outfall 002 is 100 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	Report:Report	
BOD <sub>5</sub>	---:45 mg/L	LPDES General Permit LAG530000
TSS	---:45 mg/L	LPDES General Permit LAG530000
Fecal Coliform	---:400 col/100mL	LPDES General Permit LAG530000
pH	6.0 - 9.0 s.u.	LPDES General Permit LAG530000

**Treatment:** sewage treatment plant including chlorination

**Monitoring Frequency:** 1/6 months for all parameters at the point of discharge from the sewage treatment plants. NOTE: The monitoring frequency has been reduced to 1/6 months based on a DMR review from the past three years and to be consistent with other sanitary outfalls at industrial facilities.

**Limits Justification:** LPDES General Permit LAG530000, Schedule B

BPJ Best Professional Judgement  
 su Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### 303(d)/TMDL WATERBODIES

Subsegment 040907 is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO, chlorides, and sulfates. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the steel fabrication point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also

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eliminated. Therefore for the purposes of this permit the organic enrichment/low DO impairment will be addressed as follows:

organic enrichment/low DO

To prevent the further impairment of the organic enrichment/low DO impairment, a BOD<sub>5</sub> limit has been placed on Outfalls 001 and 002.